

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

SCANSOFT, INC.

Plaintiff,

V.

VOICE SIGNAL TECHNOLOGIES, INC.,  
LAURENCE S. GILLICK, ROBERT S.  
ROTH, JONATHAN P. YAMRON, and  
MANFRED G. GRABHERR

Defendants.

Civil Action No. 04-10353 PBS

**SCANSOFT, INC.’S MOTION TO COMPEL FURTHER  
DEPOSITION OF MANFRED G. GRABHERR AND FOR SANCTIONS**

Plaintiff ScanSoft, Inc. (“ScanSoft”) moves pursuant to Fed. R. Civ. P. 37 and Local Rule 37.1 for an order compelling Manfred G. Grabherr to appear for further examination and for sanctions. The grounds for this motion are set forth in the accompanying Memorandum and Exhibits A through E to the Memorandum, filed concurrently electronically.

Accordingly, it is respectfully requested that this motion be granted. A proposed order is attached for the Court's convenience.

**CERTIFICATE PURUSANT TO RULE 7.1 AND LOCAL RULE 37.1**

I certify that counsel for ScanSoft conferred with counsel for VST on July 1, 2005, by telephone in an effort to resolve the issues presented in this motion and that counsel were unable to arrive at an agreement.

Dated: July 8, 2005

SCANSOFT, INC.,  
By its attorneys,

/s/ Rebecca L. Hanovice  
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